

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

v.

**MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and ANGELO
CARUSONE,**

Defendants.

Civil Action No. 4:23-cv-01175-O

**NOTICE OF MOTION FOR DEFENDANTS' MOTION FOR LEAVE
TO INCREASE DEPOSITIONS AND AMEND THE SCHEDULE**

Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone file this Notice of Motion for Defendants' Motion for Leave to Increase Depositions and Amend the Schedule. Defendants are filing contemporaneously with this Notice a Motion to Seal Defendants' Brief and Appendix in Support of their Motion for Leave to Increase Depositions and Amend the Schedule.

For the reason stated in the accompanying Brief, Defendants request that the Court enter an order: (1) granting Defendants leave to take up to 125 hours of fact witness depositions or, alternatively 25 fact depositions, (2) extending the fact discovery deadline to July 21, 2025, and adjusting additional dates as set forth in Defendants' accompanying Proposed Order, without changing the October 6, 2025 trial setting, and (3) resetting the deadline for summary judgment motions such that it falls after the close of fact discovery.

Respectfully submitted,

SUSMAN GODFREY L.L.P.

/s/ Justin A. Nelson

Justin A. Nelson
State Bar No. 24034766
Matthew Behncke
State Bar No. 24069355
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
Telephone: (713) 651-9366
Fax: (713) 654-6666
jnelson@susmangodfrey.com
mbehncke@susmangodfrey.com

Katherine M. Peaslee
SUSMAN GODFREY L.L.P.
401 Union Street, Suite #3000
Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: (206) 505-3811
kpeaslee@susmangodfrey.com

Gregg Costa
GIBSON, DUNN & CRUTCHER LLP
811 Main Street, Suite 3000
Houston, TX 77002-6117
Telephone: (346) 718-6649
Facsimile: (346) 718-6979
GCosta@gibsondunn.com

Dwight P. Bostwick
Shawn P. Naunton
Zuckerman Spaeder LLP
485 Madison Ave., 19th Floor
New York, NY 10022
Telephone: (212) 704-9600
Facsimile: (202) 822-8106
dbostwick@zuckerman.com
snaunton@zuckerman.com

*Attorneys for Defendants Media Matters for
America, Eric Hananoki, and Angelo
Carusone*

CERTIFICATE OF CONFERENCE

Counsel for Defendants has conferred with counsel for Plaintiff on April 7 and April 22, 2025, and Plaintiff is opposed as to Defendants' proposals with respect to depositions and moving the summary judgment deadline relative to the close of fact discovery. Plaintiff has not yet determined whether it opposes Defendants' request to move the fact discovery deadline and therefore does not agree at this time.

/s/ Katherine M. Peaslee

Katherine M. Peaslee

CERTIFICATE OF SERVICE

I certify that on April 22, 2025, a true and correct copy of Notice of Motion for Defendants' Motion for Leave to Increase Depositions and Amend the Schedule was properly served on counsel of record via electronic filing in accordance with the USDC, Northern District of Texas Procedures for Electronic Filing.

/s/ Katherine M. Peaslee

Katherine M. Peaslee